

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the )  
Commission's Procurement Incentive Framework )  
and to Examine the Integration of Greenhouse Gas )  
Emission Standards into Procurement Policies. )

R.06-04-009  
(Filed April 13, 2006)

**COMMENTS OF CALPINE CORPORATION ON  
TYPE AND POINT OF REGULATION ISSUES**

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Dated: December 3, 2007

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**COMMENTS OF CALPINE CORPORATION ON  
TYPE AND POINT OF REGULATION ISSUES**

Pursuant to the November 9, 2007 ruling of Administrative Law Judges TerKeurst and Lakritz (“November 9 ALJ Ruling”), Calpine Corporation (“Calpine”) submits these comments on type and point of regulation issues for the electricity sector. Calpine believes it will be essential to the success of Assembly Bill (“AB 32”) that the type and point of regulation policies adopted by the California Public Utilities Commission (“Commission”) and California Energy Commission promote the most efficient and cost-effective means for reducing greenhouse gas (“GHG”) emissions. As discussed below and in previous comments filed by Calpine, in the absence of a regional or national source-based system,<sup>1</sup> a deliverer/first-seller approach that allocates emission allowances to entities regulated under the program using regularly updated, output-based benchmarks will best ensure these objectives are met.

The benefits of such an approach include:

- Provision of incentives for investment and dispatch of low-emission resources;
- Minimization of leakage;
- Administrative simplicity;

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<sup>1</sup> As discussed below, Calpine supports a region wide (*i.e.*, WECC-wide) or national source-based cap-and-trade system.

- Compatibility with the operations of wholesale electricity markets, including the California Independent System Operator's ("CAISO") forthcoming Market Redesign and Technology Update ("MRTU"); and
- Consistency with the expected development of a regional and/or federal source-based system.

In establishing emission targets for California, Assembly Bill ("AB") 32 clearly expects the State to take a leadership role with respect to the reduction of GHG emissions and set an example for other states, and the nation, to follow. While Calpine supports regional and federal source-based emission trading systems, and expects one or both to be developed, it does not advocate California delaying the development and implementation of a state-based system. Having said this, Calpine believes it is important to the long-term success of California's GHG emission reduction efforts that a California-only system anticipate and take into account the expected regional and federal systems. Specifically, to the greatest extent possible, the system adopted by California should be compatible with the design of future regional and federal systems. By doing this, California will assume the leadership role contemplated by AB 32 and its efforts will more likely influence the development of a regional and national approach for reducing GHG emissions.

Calpine appreciates the challenges and difficult trade-offs faced by the Commission in determining the appropriate point of regulation for the electricity sector. These challenges, however, are not insurmountable, nor do they warrant abandoning a state-based emission trading approach. Accordingly, Calpine urges the Commission to move forward with the development of a state-based deliverer/first-seller system, while at the same time, continue to work with other Western states to develop a regional emission trading program, and to support efforts to create a national system.

### 3.1 General<sup>2</sup>

*Q1. What do you view as the incremental benefits of a market-based system for GHG compliance, in the current California context?*

Compared to other regulatory approaches, the incremental benefits of a market-based system for achieving GHG emission reductions are significant. As experience with the Acid Rain program in the United States has demonstrated, a cap-and-trade system results in emission reductions being realized at much lower costs than traditional regulatory approaches.<sup>3</sup> Emission trading is also beneficial for regulated industry because it rewards innovation and maximizes flexibility in achieving emission targets. By driving investment and technological innovation, an emission trading program can also provide long-term benefits to California's economy by placing California-based industry at the forefront of national and international efforts to address climate change.

*Q2. Can a market-based system provide additional emissions reductions beyond existing policies and/or programs? If so, at what level? How much of such additional emission reductions could be achieved through expansion of existing policies and/or programs?*

Yes, Calpine believes that a well-designed cap-and-trade system will result in emission reductions beyond those that could be expected from existing policies and programs. Unlike traditional regulatory approaches (*i.e.*, command and control), an emission trading system inherently rewards "over-compliance" by regulated entities which, in this instance, means that greater amounts of emission reductions will be realized sooner than under a system which simply requires compliance with a regulatory mandate. Over compliance is rewarded because, under cap-and-trade, entities can sell extra emissions credits. Additionally, because emission trading

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<sup>2</sup> Headings and heading numbers correspond to those in the November 9 ALJ Ruling.

<sup>3</sup> Ellerman, A. D., et al. 2003. Emissions Trading in the U.S.: Experience, Lessons, and Considerations for Greenhouse Gases. Arlington, VA: Pew Center on Global Climate Change.

achieves emission reductions at lower cost than other approaches, more resources can be dedicated to investment in low-emission technologies.

### **3.2 Principles or Objectives to be Considered in Evaluating Design Options**

*Q3. Do you agree with this set of objectives? Are there other objectives or principles that you wish to see included? If so, please include your recommendations and reasoning. Finally, please rank the objectives above, and any additional factors you propose, in order of importance.*

Calpine believes that “expandability,” “goal attainment,” and “environmental integrity” should all be considered primary objectives in evaluating design options for an emission trading system. Calpine defines expandability as the potential for a California-only emission trading system to serve as the model for a regional or national system. As noted above, Calpine believes it is important to the long-term success of California’s GHG emission reduction efforts that the trading system be designed to anticipate and take into account an expected federal trading system – in other words, be “expandable.” This objective is consistent with AB 32, which calls for California take a leadership role in reducing GHG emissions:

The program established by this division will continue this tradition of environmental leadership by placing California at the forefront of national and international efforts to reduce emissions of greenhouse gases...[A]ction taken by California to reduce emissions of greenhouse gases will have far-reaching effects by encouraging other states, the federal government, and other countries to act.<sup>4</sup>

Calpine defines goal attainment and environmental integrity as the ability of the program to attain real emission reductions, and provide incentives for investment in, and dispatch of, low-emission resources to ensure that reductions continue over the long-term. While the effectiveness of the program to minimize emission leakage is important in a California-only context, its importance will diminish under a regional or national program. Accordingly, Calpine

does not recommend that environmental integrity be defined primarily as mitigating emission leakage. In addition, the ability of the program to accurately account for actual emission reductions is fundamental to evaluating the success of the program. Thus, “accuracy” should not be considered a separate objective; but rather, viewed as a necessary component of goal attainment and environmental integrity.

Calpine ranks “cost minimization” and “compatibility with wholesale markets” next in the overall ranking of objectives. AB 32 provides that emission reduction measures be designed “in a manner that minimizes costs and maximizes benefits for California’s economy. . . .”<sup>5</sup> The overall cost of emission reductions measures for the electricity sector, and in particular, rate impacts for consumers will be higher if GHG regulation interferes with the reliability and operations of the wholesale electricity market. Thus, cost minimization and compatibility with wholesale markets should be viewed together. In addition, because a program that is administratively complex will likely be much costlier to implement than one that is administratively simple, Calpine considers “administrative simplicity” part of cost minimization.

Lastly, based on the overall tenor of the debate so far, Calpine believes that any approach for reducing GHG emissions adopted by the Commission will likely be subject to legal challenge by some party. However, given the important goals of AB 32, the Commission cannot let this “threat” prevent it from moving forward with developing a cap-and-trade program. For this reason, Calpine considers “legal risk” to be the lowest objective in terms of importance for evaluating design options.

### **3.3 Load-Based Cap-and-Trade System Design**

*Q4. With a load-based cap-and-trade system, should exports from in-state generation sources be included and accounted for under the*

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<sup>4</sup> Chapter 488, §§ 38501(c)-(d) at 2, Statutes of 2006.

<sup>5</sup> Chapter 488, § 38501(h) at 3, Statutes of 2006.

*cap? Why or why not? If so, how? For example, exports could be captured in a cap-and-trade system by regulating in-state sources that export, or by counting the emissions associated with exported power, without any compliance obligation on the exporter. There may be other options as well.*

As discussed above, in the absence of a regional or federal source-based approach, Calpine supports a deliverer/first-seller approach that allocates emission allowances to entities regulated under the program using regularly updated, output-based benchmarks. If, however, a load-based approach were adopted, exports from all in-state generation should be included in the cap to better ensure the integrity of the program and account for power exported from high-emitting resources. A tradable emission attribute certificate (TEAC) model for a load-based system would seem to address exports if in-state resources are required to certify all generation.

*Q5. How extensive do you view the threat of contract shuffling under a load-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position?*

Significant contract-shuffling is likely under a load-based system that uses contracts and settlement data to assign emissions to retail providers. A load-based approach that employs TEACs could prevent contract shuffling through appropriate restrictions on the eligibility of TEACs. In contrast, under a deliverer/first-seller approach, the risk of contract shuffling would be reduced and limited to imported power.

*Q6. Which of these systems best accounts for all imports? What are the advantages and disadvantages of each potential tracking system in terms of accuracy, cost of development and administration of tracking systems, costs of administration to the parties, and overall costs to ratepayers? Are there alternative tracking approaches that you would recommend, and for what reasons?*

Consistent with the importance Calpine places on the expandability of a California cap-and-trade system, and Calpine's expectation that a source-based system will likely be

implemented on a regional and/or national scale, Calpine does not believe that a load-based system is the best approach for California. For instance, it is unclear how a load-based California-only system would be operate if a regional or federal source-based system were also implemented. If, however, the Commission wishes to proceed with a load-based approach, Calpine urges the Commission to do so *only* in the context of a regional agreement.

If a regional load-based system is pursued, Calpine believes that a TEAC model has significant advantages over other load-based models. Because the use of TEACs would provide a carbon signal directly to generators, it would provide a strong incentive for both investment in, and dispatch of, low-emission generation. In contrast, a contract-based model provides incentives for investment, but will not affect dispatch. The capture of the carbon signal at the generator level also makes the TEAC model compatible with the operations of wholesale electricity markets, including the integrated forward market being developed under MRTU. Finally, a TEAC model would improve accuracy, because emissions would represent the actual emission rates and outputs of generators.

Because the WREGIS system is already up and running, the start up costs for a TEAC model should not be prohibitive, and would be limited to the costs of linking non-renewable generators to WREGIS. Once operational, the administrative costs of a TEAC system should be lower than a contract-based model.

*Q7. If a load-based approach is pursued, would the potential benefits of a full TEAC system be great enough to warrant the start-up and administrative costs?*

As stated above, Calpine supports a deliverer/first-seller approach rather than a load-based system and believes that, if a load-based is adopted, is should be within the context of a regional agreement. If a load-based system is adopted, then Calpine believes a TEAC system would be warranted.



### 3.4 Source-Based Cap-and-Trade System Design Options

#### 3.4.1 Pure Source-based (GHG Regulation of In-state Generation Only)

*Q8. Do you view this approach as compliant with Assembly Bill (AB) 32? Please support your answer.*

AB 32 explicitly requires California to account for emissions from all electricity consumed in the state, *including imports*.<sup>6</sup> A pure California-only source-based system would not account for emissions from imports and, as a result, would not be compliant with AB 32. Additionally, because it would not account for emissions from imports, a California-only source-based system would have the highest potential for emission leakage of any of the trading system options being considered by the Commission. Leakage would likely occur because imported power from high emitting resources would not be subject to the emissions cap or otherwise accounted for under the source-based system making it more likely that such power would be imported into the State. *Given that more than half of the GHG emissions associated with the electricity sector in California are from imports,*<sup>7</sup> an approach that does not account for emissions from imports is fundamentally flawed and would significantly undermine the State's efforts to meet the emission reduction goals in AB 32. Furthermore, because imported power would likely benefit from increased wholesale prices in the California markets as a result of the GHG emissions cap - *without actually being subject to the caps* - such an approach could lead to increased profits for out-of-state generators.

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<sup>6</sup> Chapter 488, § 38530 (b)(2) at 5, Statutes of 2006.

<sup>7</sup> California Air Resources Board, Staff Report, *California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit* (November 16, 2007) at 7.

*Q9. In light of the relatively high capacity factors of carbon-intensive facilities outside the state, how extensive do you expect the short-term threat of substituting higher-carbon imports for in-state generation to be? Might this possibility be dealt with through specific program design (e.g., allocations, limiting conditions, etc.)?*

As discussed in response to Question 8 above, the risk of emission leakage resulting from increased levels of power being imported into California from high-emitting out-of-state resources is greatest under a California-only source-based approach than alternative approaches being considered by the Commission. The extent of such leakage will be dependent on the allowance price which will drive potential profits to be realized by out-of-state resources not subject to the emissions cap. Calpine, however, expects that the amount of leakage under a California-only source-based system will likely be high.

*Q10. Given existing procurement oversight and the prospect for a regional or federal GHG program in the foreseeable future, how extensive do you expect the threat to be of a longer-term shift of production to regions beyond the reach of a California source-based cap-and-trade regime?*

The potential for emission leakage under a source-based system decreases substantially under a regional (*i.e.*, WECC-wide) or national system. However, if a regional or national system is not implemented in a timely manner, a longer-term potential for a shift in production to higher emitting resources is likely because, as discussed above, California would provide high-emitting out-of-state generators not subject to the emissions cap an opportunity to earn increased profits. While Calpine expects a regional and/or federal system will be adopted, the timing is uncertain. Therefore it would be prudent for California to adopt a deliverer/first-seller approach, rather than a source-based system to minimize the potential for emission leakage and a longer-term potential for a shift in production to higher emitting resources.

*Q11. If emissions associated with imported power are excluded from a cap-and-trade program, what policies beyond the existing suite of program including energy efficiency, California Solar Initiative, RPS, and Emission Performance Standard (EPS) do you recommend that California employ to achieve the necessary reductions from the electricity sector?*

As noted above, because a California-only source-based system would not account for emissions from imports, such a system would, on its face, be inconsistent with AB 32. In addition, the very nature of this question highlights the shortcomings of a California-only source-based system. Specifically, because out-of-state generators would not be subject to the emissions cap, a variety of indirect actions would need to be taken to (hopefully) ensure the emission reductions required by AB 32 are met. In order to meet the goals of AB 32, these indirect actions would likely place additional burdens on in-state resources, in turn increasing the costs to reduce emissions. Such an approach to ensuring compliance with AB 32 is clearly less efficient than a system that simply makes emissions from imported power subject to a cap.

*Q12. As the Public Utilities Commission does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers (investor owned utilities (IOUs), community choice aggregators (CCAs), electric service providers (ESPs), and publicly owned utilities (POUs)), which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POUs? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POUs?*

While there may be independent policy reasons for extending energy efficiency and renewable programs to POUs, for the reasons discussed in Calpine's response to Question 11, such action should not be taken in lieu of a cap that encompasses emissions from imported power.

*Q13. What sources would a source-based system cover? Could it cover California utility-owned facilities located outside of California?*

As discussed above, Calpine does not support a California-only source-based system.

*Q14. Would a strengthened EPS assist in reducing emissions due to California imports? What recommended changes would you make to the EPS?*

It is unclear what is meant by “strengthening.” Nevertheless, Calpine believes a deliverer/first-seller approach is the most effective and direct approach to account for emissions from imports in the absence of a regional or national source-based system.

### **3.4.2 Deliverer/First Seller**

*Q15. Please comment on the “First Seller Design Description” paper, which is Attachment A to this ruling. Does the paper accurately describe the deliverer/first seller program? If not, describe your concerns and include an accurate description from your perspective.*

In general, Calpine agrees with the description of the first-seller approach contained in the First Seller Design Description except that allowances could – and, in fact, should – be determined by energy produced (*i.e.*, output based). In addition, Calpine offers the following comments on other points raised in the paper.

As an initial matter, the First Seller Design Description notes that the number of first seller that would need to be regulated under a deliverer/first seller approach is significantly larger than the number of entities that would need to be regulated under load-based regulation. The paper then goes on to state:

First Seller requires tracking wholesale power transaction to identify a constantly changing set of First Sellers rather than a smaller and fairly stable set of load-serving entities [LSEs]. In that sense it is more complex than a Load-Based approach.<sup>8</sup>

While it is true that a deliverer/first-seller approach would regulate a larger number of entities than a load-based approach, Calpine disagrees that a deliverer/first-seller approach is more complex than a load-based approach. Under the load-based model currently being

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<sup>8</sup> Attachment A at 5.

considered by the Commission, all wholesale power transactions must be tracked in order to assign emissions to load serving entities (“LSEs”). In contrast, only power imports must be similarly tracked under a deliverer/first-seller approach. Furthermore, the larger number of regulated entities under a deliverer/first-seller approach compared to a load-based approach would increase market liquidity and reduce the risk of market power.

The First Seller Design Description also discusses the treatment of emissions from power that is “wheeled-through” California, and recommends that such transactions be exempted from the cap and trade system.<sup>9</sup> Exempting emissions associated with wheeled-through power will impose additional tracking requirements, and will reduce the environmental integrity of the cap-and-trade system. For these reasons, Calpine does not agree with this recommendation.

With respect to the issue of allowances, the paper concludes that allocating allowances is “less feasible” under a deliverer/first-seller approach “because it would have to include a number of regulated entities for which there is no clear, unambiguous basis for making the allocation.”<sup>10</sup> Calpine respectfully disagrees. The majority of allowances could (and should) be allocated to entities regulated under the program using an output-based benchmark.<sup>11</sup> For in-state generators, the output would be based on average net output for the three most recent calendar years. For out-of-state resources that are owned by LSEs, or under contract to an LSE, allowances could be allocated based on the percentage ownership of the resource or the terms of the contract. The only portion of the market for which allocation would not be possible is power sold through spot-markets. For this reason, it may be necessary to auction a small percentage of allowances to account for spot market sales.

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<sup>9</sup> Attachment A at 5-6.

<sup>10</sup> Attachment A at 13.

<sup>11</sup> See Calpine’s opening comments on allocation issues under this proceeding at page 20 for a detailed description of how allocation would work under a first-seller approach.

Calpine agrees with the paper's assessment that "a policy that assigns control area-based emission rates would create powerful incentives to shuffle transactions and tagging information."<sup>12</sup> With respect to this issue, the paper concludes that the Commission proposed reporting protocol provides a reasonable solution. Calpine also agrees. By limiting the attribution of facility-specific emission rates to imports from resources that are either fully or partially owned by in-state LSEs, or that are under specified contract to one of these providers, the Commission's proposed protocol would minimize the potential for contract shuffling.

### **3.4.3 Source-based for In-state Generation, Loadbased for Imports**

*Q16. Please describe in detail your view of how this option would work.*

As Calpine understands this option, in-state generators would be the point of regulation as would be the case under a first-seller approach. For imports, however, LSE would be the point of regulation, regardless of the entity holding title to the power at the time it entered California.

*Q17. Do you support such an approach? Why or why not?*

Calpine does not support this option because it would bestow a competitive advantage on out-of-state sources that sell power into the CAISO markets. Specifically, because out-of-state sources will not have to account for a carbon price when importing power into California (as they would under a deliverer/first-seller approach), they will be able to bid into the CAISO markets at lower prices relative to in-state generators. This price disparity will encourage increased imports through these markets. When LSEs consider procurement of power from out-of-state sources through bilateral contracts, they will factor in the allowance price for their cost. For power procured through the CAISO markets, however, LSEs will not know in advance

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<sup>12</sup> Attachment A at 9.

whether the power has been sourced in-state or out-of-state. For these reasons, Calpine advocates a deliverer/first seller approach, instead of this option.

*Q18. Does this approach have legal issues associated with it? Provide a detailed analysis and legal citations.*

Calpine is not submitting a specific response to this issue at this time.

*Q19. If retail providers are responsible for internalizing the cost of carbon for imported power, all power generated in-state may need to be tracked to load to avoid double regulation of in-state power. Do you agree?*

Calpine is not submitting a specific response to this issue at this time.

*Q20. If that is the case, does a mixed source-based/load-based approach offer any advantages compared to a load-based approach in terms of simplifying reporting and tracking? What if the load-based system uses TEACs? How could imports be differentiated from in-state generation in a way that reduces the complexity of reporting and tracking compared to a load-based approach?*

Calpine is not submitting a specific response to this issue at this time.

### **3.5 Deferral of a Market-based Cap-and-Trade System**

*Q21. How important is it that a cap-and-trade system be included in the near-term as part of the electricity sector's AB 32 compliance strategy?*

As discussed above, a cap-and-trade system results in emission reductions being realized at much lower costs than other approaches and would encourage investment in low-emitting resources and technological innovation. Encouraging investment and technological innovation, will provide long-term environmental benefits, as well as benefits to California's economy by placing California-based industry at the forefront of national and international efforts to address climate change. Accordingly, Calpine does not support deferring the implementation of a cap-and-trade system. Furthermore, deferral of a cap-and-trade program would be inconsistent with provisions in AB 32 that direct California to take a leadership role with respect to GHG emission reduction efforts. While a federal or regional cap-and-trade system would be preferable to a

California-only system, Calpine firmly believes that action by California now will provide a critical push for the development of a federal or regional program.

*Q22. Would your answer to Q12 be different if there is no market-based cap-and-trade system? If so, please explain.*

Calpine is not submitting a specific response to this issue at this time.

*Q23. Address the following:*

- *How emission reduction obligations could be met if there is no cap-and-trade system for the electricity sector,*
- *How increased programmatic goals would impact rates, and*
- *How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.*

Calpine believes that California's integration into a regional or federal system will be facilitated by the adoption of a trading system that can serve as a model for the national or regional system. As discussed above, Calpine expects a source-based system to be enacted regionally and/or nationally. By implementing a deliverer/first-seller system now, California would be putting in place a California-only system that will ensure reductions in GHG emissions in the State and, at the same time, be compatible with future systems likely to be adopted. Equally important, implementation of a California-only system in advance of a regional or federal system will ensure that California remains at the forefront of emission reduction efforts and provide the electricity and other regulated sectors experience with GHG emissions trading, so that market participants will be able to better participate in a federal cap-and-trade market once it is in place.



*Q24. How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.*

As discussed in response to Question 23 above, deferral of a cap-and-trade program for the electricity sector would hinder California's integration into a subsequent regional or federal program.

*Q25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?*

Calpine believes that a state-level cap-and-trade system, in particular a deliverer/first-seller approach, would be the most efficient and cost-effective means for reducing GHG emissions, in the absence of a federal or regional source-based system. Accordingly, Calpine supports immediate adoption of a deliverer/first seller system as the primary means for achieving the emission reduction goals set by AB 32.

*Q26. What flexible compliance mechanisms could be integrated into a non-market based GHG emission reduction approach?*

Calpine does not believe a non-market based emission reduction approach is an effective nor appropriate means for achieving GHG reductions from the electricity sector.

*Q27. If a market-based cap-and-trade system is not implemented for the electricity sector in 2012, how would you recommend addressing early actions that entities may have undertaken in anticipation of a market?*

Allocating allowances to entities regulated under the program during the early years of the cap-and-trade program using an out-based benchmark that is regularly updated (as opposed to starting off with a 100% auction) would reward "early actors" who have already invested in low-emission technologies because the quantity of allowances an entity receives will be predicated on the entity's output, rather than grandfathered emission levels.

### 3.6 Recommendation and Comparison of Alternative

*Q28. Submit your comprehensive proposal for the approach California should utilize regarding the point of regulation and whether California should implement a cap-and-trade program at this time for the electricity sector. If you recommend that another approach be considered besides those detailed above, propose it here. If you recommend one of the above options, give as detailed a discussion as possible of how the approach would work.*

In the absence of a regional or national system, Calpine urges the Commission to proceed with the design and implementation of a deliverer/first-seller approach for the electricity sector, as part of a multi-sector GHG trading system for California. Such a system, when combined with an allowance allocation approach that allocates emission allowances to entities regulated under the program using regularly updated, output-based benchmarks, will provide incentives for investment in low emission resources; encourage dispatch of such resources; minimize leakage; be compatible with the operation of wholesale electricity markets; and better ensure consistency with the expected development of regional and/or federal source-based systems. In addition, California should continue to work with other states involved with the Western Climate Initiative and participate in federal efforts to develop a regional and/or national source-based trading system.

*Q29. Address and compare how each of the alternatives identified in the above questions, and the proposal you submit in response to the preceding question, would perform relative to each of the principles or objectives listed above and any other principles or objectives you propose. For each alternative, address important tradeoffs among the principles.*

Calpine does not believe that non-market approaches nor load-based trading models would best meet the overall objectives of AB 32, particularly expandability which, given the expected development of regional and/or national source-based systems, is critical to the long-term success of California's GHG emission reduction efforts. In addition, non-market approaches would likely be more expensive than other options.

In contrast, both a source-based system and a deliverer/first-seller approach would likely be consistent with the expected regional and federal source-based systems. However, because a deliverer/first-seller approach would reduce emission leakage relative to a source-based system, and would not result in increased profit opportunities for high-emitting out-of-state generators, a first-seller approach has clear advantages over a source-based system in a California-only context.

Respectfully submitted,

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Dated: December 3, 2007

**CERTIFICATE OF SERVICE**

I, Robin Huey, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111.

On December 3, 2007, I caused the following to be served:

**COMMENTS OF CALPINE CORPORATION ON  
TYPE AND POINT OF REGULATION ISSUES**

via electronic mail to all parties on the service list R.06-04-009 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as "Parties" and "State Service" on the attached service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

\_\_\_\_\_  
/s/ Robin Huey

Robin Huey

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